

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JOHN DOE,
Plaintiff,

v.

LAW SCHOOL ADMISSION COUNCIL,
Defendant.

Case No. 1:17-cv-06656

DEFENDANT’S MOTION FOR LEAVE TO FILE CERTAIN EXHIBITS UNDER SEAL

Defendant Law School Admission Council (“LSAC”), through counsel and pursuant to Local Rule 26.2, respectfully requests leave to file Exhibits A and H to Exhibit 1 to its Local Rule 56.1(A)(2) Statement of Material Facts as to Which There Are No Genuine Issues, filed in support of its Motion for Summary Judgment (“MSJ”), under seal. In support, LSAC states as follows:

1. As the Court may recall, this case involves allegations under the Americans with Disabilities Act and involves matters related to Plaintiff’s psychological health and education. The Court has provisionally granted Plaintiff’s motion to proceed anonymously. (ECF 116).

2. In light of the Court’s order, LSAC has redacted personally identifying information from numerous documents filed as exhibits in connection with its MSJ. Two of those exhibits, however, contain so much potentially identifying and otherwise confidential information (primarily, copies of plaintiff’s high school IEP) that redaction is infeasible.

3. Accordingly, LSAC seeks leave to file Exhibits A and H to Exhibit 1 to its statement of facts under seal. Pursuant to Local Rule 26.2, LSAC has contemporaneously filed the fact statement under seal and a public version of the document with the two exhibits redacted.

WHEREFORE, pursuant Local Rule 26.2, LSAC respectfully requests that the Court enter an order granting it leave to file Exhibits A and H to Exhibit 1 to its Local Rule 56.1(A)(3)

Statement of Material Facts as to Which There Are No Genuine Issues under seal and grant such other relief as it deems just and proper.

Dated: September 24, 2021

Respectfully submitted,

Law School Admissions Council

By: /s/Jonathan M. Cyrluk
One of LSAC's Attorneys

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CERTIFICATE OF SERVICE

I, Jonathan M. Cyrluk, an attorney, hereby certify that, on September 24, 2021, I caused a copy of the foregoing to be served on all counsel of record via the Court's CM/ECF system.

/s/Jonathan M. Cyrluk
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